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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARBIN RAMIREZ-RODAS,

Defendant.

Case No. 2:20-mj-1038-NJK

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, and Raquel Lazo, Assistant Federal Public Defender, counsel for Defendant MARBIN RAMIREZ-RODAS, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The government has made a plea offer in this case, which the defendant has accepted. He has executed a written plea agreement and waived indictment. A hearing for

1 the change of plea has not yet been set. The parties will jointly request an expedited
2 sentencing immediately after the defendant enters a guilty plea.

3 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
4 history until after the defendant enters his guilty plea unless the Court enters an order
5 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
6 a defendant's initial appearance when charged by indictment.

7 3. The U.S. Probation Office informs the government that it would like to begin
8 obtaining the criminal history of defendants looking for an expedited sentencing as soon as
9 possible after their initial appearance so that the Probation Office can complete the
10 Presentence Investigation Report by the time of the expected expedited sentencing.

11 4. Accordingly, the parties request that the Court enter an order directing the
12 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

13 DATED this __1st__ day of February, 2021.

14 Respectfully submitted,

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16 NICHOLAS A. TRUTANICH
United States Attorney

17 /s/Raquel Lazo
18 RAQUEL LAZO
Assistant Federal Public Defender
Counsel for Defendant
19 MARBIN RAMIREZ-RODAS

/s/Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARBIN RAMIREZ-RODAS,

7 Defendant.

Case No. 2:20-mj-1038-NJK

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a Criminal History Report**

8 Based on the stipulation of counsel, good cause appearing, and the best interest of
9 justice being served:

10 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
11 report detailing the defendant's criminal history.

12 DATED: February 2, 2021.

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15 HONORABLE NANCY J. KOPPE
16 UNITED STATES MAGISTRATE JUDGE
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